

EXHIBIT 2

**BEFORE THE JUDICIAL PANEL
ON MULTIDISTRICT LITIGATION**

**IN RE GOOGLE ANTITRUST
LITIGATION**

MDL No. __

**PLAINTIFF'S MOTION FOR
TRANSFER AND CONSOLIDATION OF RELATED ACTIONS
PURSUANT TO 28 U.S.C. § 1407**

Plaintiff J. Jackson Paige respectfully moves this Panel under 28 U.S.C. § 1407 and Judicial Panel on Multidistrict Litigation Rule 6.2 for an order transferring eleven related actions pending in two different district courts to a single district court for consolidated or coordinated pretrial proceedings. Plaintiff specifically requests that the related actions be transferred to and consolidated before the Honorable Amit P. Mehta in the United States District Court for the District of Columbia.

The related actions, which are listed in the Schedule of Actions accompanying this motion, include: *Epic Games, Inc. v. Google LLC, et al.*, No. 3:20-cv-05671 (N.D. Cal.); *Carr v. Google LLC, et al.*, No. 3:20-cv-05761 (N.D. Cal.); *Pure Sweat Basketball, Inc. v. Google LLC, et al.*, No. 3:20-cv-05792 (N.D. Cal.); *Peekya Services, Inc. v. Google LLC, et al.*, No. 3:20-cv-06772 (N.D. Cal.); *Bentley, et al. v. Google LLC, et al.*, No. 3:20-cv-07079 (N.D. Cal.); *McNamara v. Google LLC, et al.*, No. 3:20-cv-07361 (N.D. Cal.); *Herrera v. Google LLC*, No. 3:20-cv-07365 (N.D. Cal.); *Carroll, et al. v. Google LLC, et al.*, No. 3:20-cv-07379 (N.D. Cal.); *In re Google Digital Advertising Antitrust Litigation*, No. 5:20-cv-03556 (N.D. Cal.); *U.S., et al. v Google LLC*, No. 1:20-cv-03010 (D.D.C.); and *Paige v. Google LLC, et al.*, No. 1:20-cv-03158 (D.D.C.). For the reasons set forth in the accompanying memorandum, Plaintiff's motion to transfer and consolidate these actions for pretrial purposes should be granted.

Dated: November 5, 2020

Respectfully submitted,

/s/ Jonathan W. Cuneo

Jonathan W. Cuneo
Victoria Sims
Blaine Finley
CUNEO GILBERT & LADUCA, LLP
4725 Wisconsin Ave., NW Suite 200
Washington, DC 20016
202-789-3960
jorc@cuneolaw.com
vicky@cuneolaw.com
bfinley@cuneolaw.com

Gerard V. Mantese
Kathryn Eisenstein
MANTESE HONIGMAN, P.C.
1361 E. Big Beaver Road
Troy, MI 48083
Phone: (248) 457-9200 ext. 203
Fax: (248) 457-9201
gmantese@manteselaw.com
keisenstein@manteselaw.com

Counsel for Plaintiff J. Jackson Paige